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1 2 3 4 5 6 7 8 9	LEADER-PICONE & YOUNG, LLP MALCOLM LEADER-PICONE /State Bar No. 104 1970 BROADWAY, SUITE 1030 OAKLAND, CA 94612 TELEPHONE: 510-444-2404 FACSIMILE: 510-444-1291 EMAIL: mlp@leader-picone.com  KIM & ASSOCIATES JAMES J. KIM (State Bar No. 101809) 1970 BROADWAY, SUITE 1030 OAKLAND, CA 94612 TELEPHONE: 510-444-0709 FACSIMILE: 510-444-1291 EMAIL: jkim@roklaw.com  Attorneys for Plaintiff NORLAN PRUDENTE	620)	
11	UNITED STATES DISTRICT COURT		
12	EASTERN DISTRICT OF CALIFORNIA		
13	SACRAMENTO DIVISION		
14			
15	NORLAN PRUDENTE,	) Case No. 2:20-cv-00482-JAM-DB	
16	Plaintiff,	) ) <u>Trial Date: March 14, 2022</u>	
17	VS.	) STIPULATION TO EXTEND EXPERT ) WITNESS DISCLOSURE DEADLINE	
18 19	COUNTY OF SAN JOAQUIN; DOMINGO RAGASA, RN; and DOES ONE through TWENTY, inclusive,	) and ORDER.	
20	Defendants.	) )	
21		<i>)</i> )	
22		) )	
23		) )	
24		)	
25	<u>STIPULATION</u>		
26	Plaintiff NORLAN PRUDENTE and defendants COUNTY OF SAN JOAQUIN and		
27	DOMINGO RAGASA, RN stipulate and agree, through their respective counsel, as follows.		
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-1-

Case No. 20-3990 SK

STIPULATION EXTENDING DEADLINE

## Case 2:20-cv-00482-JAM-DB Document 18 Filed 07/26/21 Page 2 of 2

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1	1. In its Septemb	ber 22, 2020 Scheduling Order, the Court established the	
2	Designation of Expert Witnesses as July 16, 2021. By Stipulation and Order that deadline was		
3	extended to July 30, 2021.		
4	2. Although plai	intiff's counsel have secured the services of an expert, that exper	
5	schedule will not permit him to complete his Rule 26 report prior to the July 30, 2021 deadline.		
6	3. Therefore, the	e parties jointly request that the Court extend the Designation of	
7	Expert Witness deadline to August 16, 2021; and extend the Supplemental Disclosure of any rebutta		
8	experts deadline to August 30, 2021.		
9	SO STIPULATED.		
10	DATED: July 23, 2021.	Leader-Picone & Young, llp	
11	<b>,</b> -7 -		
12		BY: MALCOLM LEADER-PICONE	
13		Attorneys for Plaintiff NORLAN PRUDENTE	
14		TORE/TO TRODE TO	
15	DATED: July 23, 2021.	RIGGIO MORDAUNT & KELLY	
16		BY: /s/ Lori A. Reihl	
17		LORI A. REIHL Attorneys for Defendants	
18		COUNTY OF SAN JOAQUIN and DOMINGO RAGASA, RN	
19		DOMINGO KAGASA, KN	
20	<u>ORDER</u>		
21	Based upon the foregoing Stipulation of the parties, and for good cause appearing,		
22	IT IS SO ORDERED.		
23			
24	DATED: July 23, 2021	/s/ John A. Mendez	
25		THE HONORABLE JOHN A. MENDEZ UNITED STATES DISTRICT COURT JUDGE	
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